

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

VIVIAN BERT, et al.,	:	Case No. C-1-02-467
	:	
Plaintiffs,	:	Judge Beckwith
	:	Magistrate Judge Hogan
vs.	:	
	:	JOINT MOTION FOR
AK STEEL CORPORATION,	:	<u>STAY OF PROCEEDINGS</u>
	:	
Defendant.	:	

The parties recently completed their exchange of expert reports. Since the final expert report was served, the Plaintiffs and Defendant have opened settlement discussions. Because of the nature and complexity of the pending action, the parties are in agreement that it will take several discussions and possibly mediation to determine whether a settlement can be achieved. Therefore, in order to avoid the accrual of potentially unnecessary legal fees and in order to allow the parties to focus exclusively on these settlement efforts, the parties request the Court to stay all further proceedings for sixty (60) days. If the Court grants this request, the parties will file a status report in thirty (30) days to keep the Court abreast of the progress of the settlement discussions.

Respectfully submitted,

s/ Gregory Parker Rogers
Lawrence J. Barty (0016002)
Patricia Anderson Pryor (0069545)
Gregory Parker Rogers (0042323)
Roger A. Weber (0001257)
Taft, Stettinius & Hollister LLP
425 Walnut Street, Suite 1800
Cincinnati, Ohio 45202-3957
(513) 381-2838
(513) 381-0205 (fax)

Attorney for Defendant
AK Steel Corporation
{W0495643.1}

s/ Robert F. Childs
Robert F. Childs (*pro hac vice*)
Barry V. Frederick (*pro hac vice*)
Herman Nathaniel Johnson, Jr. (*pro hac vice*)
Susan Gale Donahue (*pro hac vice*)
Allison W. Lowell (*pro hac vice*)
Wiggins, Childs, Quinn & Pantazis, LLC
The Kress Building
301 19th Street North
Birmingham, Alabama 35203
(205) 314-0500
(205) 254-1500 (fax)

Paul Henry Tobias (OH Bar No. 0032415)
David Donald Kammer
Tobias, Kraus & Torchia
414 Walnut Street
Suite 911
Cincinnati, Ohio 45202
(513) 241-8237
(513) 241-7863 (fax)

David W. Sanford (*pro hac vice*)
Sanford, Wittels & Heisler, L.L.P.
2121 K Street, N.W.
Suite 700
Washington, D.C. 20037
(202) 942-9124
(202) 628-8189 (fax)

Attorneys for the Plaintiffs